

August 10, 2001

Mary Cottrell, Secretary
Department of Telecommunications and Energy
One South Station
Boston, MA 02110
Attn: Andrew Kaplan, Hearing Officer

**SUBJ: BARNSTABLE COUNT HUMAN SERVICES COMMENTS ON
DTE/DPU 90-3C/91-80A**

Dear Mr. Kaplan:

I recently learned of the "Enhanced Outreach Program" plan submitted to the Department of Telecommunications and Energy by the Attorney General and Commonwealth Electric Company and wish to comment on this matter.

My name is Len Stewart and I am the director of Barnstable County Human Services – a department of County Government charged with maintaining, coordinating, and enhancing the health and human services safety net of services available to residents of Cape Cod, with particular emphasis on those aimed at low-income individuals and underserved communities.

We have been concerned about the status of low-income customers of Commonwealth Electric Company for some time, and have over the past 12 months, worked collaboratively with a number of social services organizations to address some of the problems we have noted in the present system. Although we are not a party to the proceeding, we believe that our on-going responsibilities and daily work experience qualify us to provide meaningful comments on the matter before you.

Our understanding is that the Attorney General and Commonwealth Electric (with the support of IRATE, Inc.) submitted for approval a program designed to provide eligible consumers with monies to assist them to pay overdue electric bills on the condition that the customer participates in Commonwealth Electric's energy efficiency and budget counseling services. It is also our understanding that the Low Income Energy Assistance Network (LEAN) is opposed to this program as proposed.

While we endorse the sentiment to assist low-income consumers, we join LEAN in its opposition. Based on our experience we believe that the proposed remedy will not function as intended. Unfortunately, neither our agency, nor any other low-income provider on the Cape with whom I have spoken was consulted in the development of the program. Such dialog might have resulted in a program that would prove more useful to low-income consumers to assist them to meet fundamental needs.

If I may, I would like to mention a directly-related low-income issue that should be significant for the Attorney General and Commonwealth Electric. Last year we helped to convene meetings of low-income service providers on the Cape to address issues related to the minimal level of enrollment in the electric discount program (estimated at approximately 25 percent of eligible low income consumers on the Cape). At that time we worked with John Howat of the National Consumer Law Center and Margaret Downey of the Cape Light Compact to identify problems in the enrollment program and develop possible solutions. We had previously encountered a similar problem with enrollment of low-income residents in public health insurance programs and developed a workable solution to that problem. We formulated a proposal and met with representatives of Commonwealth Electric to offer assistance in designing and implementing a similar program to enhance enrollment in the low-income rate program. The Company turned down our proposal, and to our knowledge no improvement in enrollment has been made.

Whatever program the Company formulates for assistance to low-income consumers, it is essential to start with an effective enrollment process for the discount program. It is also essential to understand that payment issues are not an isolated electric-utility problem, but a human services problem that should be resolved in working cooperatively with human service providers who have daily contact and experience with this segment of the population, as well as actual "consumers" or beneficiaries of the service or program to be designed.

We urge you to deny approval of the program as currently formulated and to recommend that the Attorney General convene meetings with human service providers and the Company to redesign an assistance program for low-income consumers. We will be happy to partner with them in convening such a working group to assure widespread participation and an effective solution.

Thank you for your consideration.

Sincerely,

Len Stewart
Director